

IN THE UNITED STATES DISTRICT COURT
FORT THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

REGINALD BROWN : **VIOLATIONS:**

: **21 U.S.C. § 841(a)(1) (possession with**

: **intent to distribute cocaine base (“crack”)**

: **- 1 count)**

: **21 U.S.C. § 841(a)(1) (possession with**

: **intent to distribute cocaine - 1 count)**

: **18 U.S.C. § 931 (felon in possession of**

: **body armor - 1 count)**

: **Notice of additional factors**

: **Notice of prior conviction**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 24, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

REGINALD BROWN

knowingly and intentionally possessed with intent to distribute more than 5 grams, that is
approximately 12 grams, of a mixture or substance containing a detectable amount of cocaine
base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 24, 2004, at Philadelphia, in the Eastern District
of Pennsylvania, defendant

REGINALD BROWN

knowingly and intentionally possessed with intent to distribute approximately 373 grams of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 24, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

REGINALD BROWN,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime of violence,
knowingly possessed body armor sold and offered for sale in interstate and foreign commerce,
that is, two bulletproof vests.

In violation of Title 18, United States Code, Sections 931 and 924(a)(7).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment,
defendant **REGINALD BROWN**:

a. Committed an offense and relevant conduct involving more than 5
grams of cocaine base, as described in U.S.S.G. § 2D1.1(a)(7).

2. In committing the offense charged in Count Two of this indictment,
defendant **REGINALD BROWN**:

a. Committed an offense and relevant conduct involving more than
300 grams of cocaine, as described in U.S.S.G. § 2D1.1(a)(9).

3. In committing the offenses charged in Counts One through Three of
this indictment, defendant **REGINALD BROWN** :

a. Committed the instant offense while under a criminal justice
sentence, that is, parole, as defined by U.S.S.G. § 4A1.1(d).

NOTICE OF PRIOR CONVICTION

THE GRAND JURY FURTHER CHARGES THAT:

Defendant **REGINALD BROWN** committed the offenses charged in Counts One through Three of this indictment after having been convicted of a felony drug offense as follows:

1. May 29, 1990, in the Court of Common Pleas of Chester County (Pennsylvania), defendant was sentenced to 11 months, 15 days to one year imprisonment upon conviction, under Docket Number 9841-89, for possession of a controlled substance an offense that constitutes a felony under the laws of the Commonwealth of Pennsylvania.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney